

EXHIBIT D

Defendant

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) CA No. 22-11674-PBS
) Pages 7-1 - 7-124

JURY TRIAL DAY SEVEN

BEFORE THE HONORABLE PATTI B. SARIS
UNITED STATES DISTRICT JUDGE

United States District Court
1 Courthouse Way, Courtroom 19
Boston, Massachusetts 02210
July 23, 2025, 9:07 a.m.

LEE A. MARZILLI
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United States District Court
1 Courthouse Way, Room 7200
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1 you to get back on the target very easily.

2 MR. CAMPBELL: Thank you, your Honor.

3 Q. I've already asked you why Cambridge didn't want an
4 external thumb safety. Why is it that Cambridge didn't want a
5 tabbed trigger or superfluous external controls?

6 A. We don't want officers to have that extra step when
7 dealing with high-stressful situations.

8 Q. If you move to Page 2 of the email and blow up the first
9 full paragraph and the -- yes, right to there.

10 You write -- and you actually copied this from the Sig
11 website; is that right?

12 A. Yes.

13 Q. And you included this information from the Sig website to
14 your trainers and officers about the gun; is that right?

15 A. Correct.

16 Q. And it says, "Safety isn't negotiable. The P320 maximizes
17 peace of mind with a robust safety system. Never again will
18 you need to pull the trigger to disassemble your pistol."

19 What does that mean?

20 A. Unlike the Glock, for example, you're required to -- when
21 you're taking the weapon apart, you're required to press that
22 trigger in order to disassemble the weapon.

23 Q. And what can happen if you're cleaning or disassembling a
24 weapon, and, in order to do that, you have to pull the trigger?

25 A. If you don't -- can you ask me the question again?

1 Q. Yes. What can happen with a Glock when you need to pull
2 the trigger to clean it or disassemble it? Why is that an
3 issue?

4 A. If you forget that there was a round in the chamber and
5 you pull that, you can shoot yourself.

6 Q. And with the P320, what was different about it in that
7 operation of the weapon?

8 A. That you didn't have to.

9 Q. Did you view that as a positive feature?

10 A. Yes.

11 Q. And then it goes on after that statement, "And while
12 available as an option, you won't need a tabbed trigger safety
13 for your gun to be drop-safe." Do you see that?

14 A. Yes.

15 Q. You knew that a tabbed trigger was available as an option
16 from Sig, right?

17 A. Yes.

18 Q. Why didn't you choose a tabbed trigger from Sig as an
19 option for this weapon?

20 A. Again, I was not part of it, so I wouldn't be able to
21 answer that.

22 Q. As a teacher and a 27-year user of the weapon, would you
23 want that tabbed trigger on this weapon?

24 A. No.

25 Q. Why not?

1 A. Again, it goes back to training, muscle memory. It goes
2 back to the stressful situation, be able to pull the handgun
3 quick enough to address the target.

4 Q. Then it goes on. "From the trigger to the striker and
5 even the magazine, the P320 won't fire unless you want it to,"
6 and it lists several things. "Striker safety: Prevents the
7 striker from releasing unless the trigger is pulled."

8 And you know that, that the gun won't fire unless the
9 trigger is pulled, right?

10 A. That's correct.

11 Q. "Disconnect safety: Prevents the pistol from firing out
12 of battery." What does that mean?

13 A. These are a numerous of internal safety that I'm familiar
14 with, but to go in details, I'm not an expert.

15 Q. It says you "Must remove the magazine, must lock slide to
16 rear, rotate takedown lever for disassembly without tools or
17 trigger manipulation, tabbed trigger safety, magazine
18 disconnect safety." Did I read that correctly?

19 A. Yes.

20 Q. And you understand from the previous statement, the tabbed
21 trigger was available as an option if Cambridge wanted it?

22 A. Yes.

23 Q. Did you ever ask, you personally, about tabbed triggers?

24 A. I did not.

25 Q. Do you know whether anybody at Cambridge did that?